

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-08-KAJ
	:	
RICHARD REID,	:	
	:	
Defendant.	:	

MOTION FOR WAIVER OF SPEEDY TRIAL

The Defendant, Richard Reid by and through undersigned counsel, Eleni Kousoulis, hereby moves for waiver of speedy trial in this matter and requests that trial in this matter be set for a date beyond the allowable time period under the Speedy Trial Act. In support of this motion, the defendant submits as follows:

1. Trial in this matter is scheduled for January 17, 2007. This trial date, which is outside of that normally allowable under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), was set at the request of the defendant who requires additional time to prepare for trial.

2. The defendant hereby waives his speedy trial rights for the purposes of this extended trial date and has no objection to the exclusion of the additional time, as calculated by the Speedy Trial Act, to allow the defense adequate time to prepare for trial.

3. The defendant asserts that relief from the Speedy Trial Act is in the best interest of the defendant and that a continuance is in the interests of justice. Continuances are to be granted when the best interest of the public and the defendant in a speedy trial are outweighed by the ends of justice.

18 U.S.C. § 3161 (h)(8)(A); United States v. Brooks, 697 F.2d 517, 520 (3d Cir. 1982). 18 U.S.C. § 3161(h)(8) provides that where it serves the ends of justice a continuance or exclusion of time may be appropriate. See also United States v. Jean 25 F.3d 588 (7th Cir. 1994).

4. Sophie Bryan, counsel for the government, does not oppose this request.

WHEREFORE, for these reasons and any other such reasons that shall appear to the Court, the defense respectfully requests trial in this matter be set for a date outside of what is normally allowable by the Speedy Trial Act and the defendant waives his speedy trial rights for the purposes of this extended trial date.

Respectfully Submitted,

/s/_____
Eleni Kousoulis, Esq.
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Counsel for Defendant Richard Reid

Dated: November 27, 2006

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FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
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Plaintiff,	:	
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v	:	Criminal Action No. 06-08-KAJ
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RICHARD REID,	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of Defendant Motion for Waiver of Speedy Trial is available for public viewing and downloading and was electronically delivered on November 27, 2006, to:

Sophie Bryan, Esquire
Assistant U.S. Attorney
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Wilmington, DE 19899-2046

/s/

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